

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ERMIAS BETURE, ELISHA POLOMSKI,  
and JAMES SAMUELSON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendant.

2:17-CV- 5757-SRC-CLW

**STIPULATION**

WHEREAS Plaintiffs Ermias Beture, Elisha Polomski and James Samuelson (“Plaintiffs”) served the Complaint on Defendant Samsung Electronics America, Inc. (“Samsung”) on August 16, 2017;

WHEREAS Samsung’s answer, motion or other response to the Complaint is currently due on September 6, 2017; and

WHEREAS Plaintiffs anticipate that they will amend the Complaint;

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned counsel on behalf of their respective clients, as follows:

1. No response to the Complaint by Samsung is necessary.
2. Plaintiffs shall file an Amended Complaint on or before September 20, 2017.
3. Samsung shall answer, move or otherwise respond to the Amended Complaint on or before October 31, 2017.

[signatures on following page]

KANTROWITZ, GOLDHAMER &  
GRAIFMAN, P.C.

/s/ Gary S. Graifman

Gary S. Graifman  
210 Summit Avenue  
Montvale, New Jersey 07645

-and-

Nicholas A. Migliaccio (*pro hac vice*  
application to follow)  
Jason S. Rathod (*pro hac vice* application  
to follow)  
MIGLIACCIO & RATHOD LLP  
412 H Street N.E., Ste. 302  
Washington, DC 20002  
Tel: (202) 470-3520

*Attorneys for Plaintiffs*

GREENBERG TRAURIG, LLP

/s/ Eric D. Wong

Richard A. Edlin  
Eric D. Wong  
Yangho Charles Shin  
500 Campus Drive, Suite 400  
Florham Park, NJ 07932

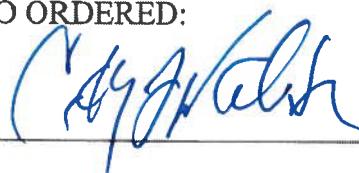
-and-

Robert Herrington (*pro hac vice* application  
to follow)  
GREENBERG TRAURIG, LLP  
1840 Century Park East, Suite 1900  
Los Angeles, CA 90067

*Attorneys for Defendant Samsung  
Electronics America, Inc.*

Dated: September 5, 2017

SO ORDERED:



9/13/17

HON. STANLEY R. CHESLER

